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Attorneys for Defendants  
EVENT TICKETS CENTER, INC.  
and TICKETNETWORK, INC.

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

KRISTINA HERNANDEZ and JULIE VARON, each individually and on behalf of all others similarly situated,

Plaintiff,

V.

EVENT TICKETS CENTER, INC., and  
TICKETNETWORK, INC.,

## Defendants.

Case No. 2:24-CV-01983-DAD-AC

## **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES**

## **STIPULATION**

Pursuant to Federal Rules of Civil Procedure Rule 6, Plaintiff Kristina Hernandez (“Hernandez”) and Julie Varon (“Varon”) (together, the “Plaintiffs”) and Defendants Event Tickets Center, Inc. (“ETC”) and TicketNetwork, Inc. (“TN”) (together, the “Defendants,” and together with Plaintiffs, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on November 14, 2024, the Court issued a Scheduling Order setting forth case deadlines including the completion of fact and expert discovery, the deadline to file dispositive motions, the final pretrial conference, and the date of trial (Dkt. 15);

WHEREAS, on June 4, 2025, the Court granted Plaintiffs' motion for leave to file a Second Amended Complaint ("SAC") which, *inter alia*, added TN as a new Defendant, and thus on June 5, 2025, Plaintiffs filed the SAC, which is currently the operative pleading;

WHEREAS, in light of the SAC's filing, on June 6, 2025 the Court denied without prejudice Defendant ETC's then-pending motion to compel arbitration as to the prior complaint, finding the motion moot given the new SAC;

WHEREAS, on June 13, 2025, after meeting and conferring regarding the naming of TN as an additional defendant, the parties jointly agreed upon and entered a stipulation seeking an approximately 90-day extension of the then-existing deadlines under Rule 16(b) (Dkt. 48);

WHEREAS, on June 16, 2025, the Court entered a minute order granting the parties' stipulation and extending the deadlines for the completion of fact and expert discovery, the filing of dispositive motions, the final pretrial conference, and the date of trial (Dkt. 49);

WHEREAS, Defendants ETC and TN each responded to the SAC by filing a Motion to Compel Arbitration on July 11, 2025, which motions are now fully briefed and currently pending before the Court;

WHEREAS, each Defendant's pending Motion to Compel Arbitration is based in

1 part on arguments related to each Defendant's lack of significant participation in the  
 2 discovery process;

3 WHEREAS, in light of the foregoing procedural posture regarding the  
 4 Defendants' respective Motions to Compel Arbitration, the Parties stipulate that any  
 5 discovery propounded by the Defendants from this point onward will not be construed  
 6 as a waiver of arbitration by either Defendant nor raised in support of any such argument.  
 7 The Parties reserve all other rights and arguments regarding the pending Motions to  
 8 Compel Arbitration, including Plaintiffs' argument that Defendant ETC already waived  
 9 any alleged right to compel arbitration through its litigation of this case before filing its  
 10 Motion to Compel Arbitration;

11 WHEREAS, the Parties diligently met and conferred following Defendants'  
 12 determination that they would seek an extension of the current discovery deadlines in  
 13 light of the foregoing and stipulated to the following proposed deadlines.

Event	Existing Date	Proposed Date
Completion of fact discovery	November 12, 2025	January 12, 2025
Initial expert disclosures and reports	December 15, 2025	February 16, 2026
Rebuttal expert disclosures and reports	January 13, 2026	March 13, 2026
Completion of expert discovery	February 12, 2026	April 13, 2026
Last day to file dispositive motions	April 7, 2026	June 8, 2026

25 WHEREAS, although this is the Parties' second request for an extension of time  
 26 regarding the deadlines set forth by the Court, it is the first such request following the  
 27 filing of the currently pending motions to compel arbitration, and is made in good faith  
 28 and is not made for the purpose of causing unwarranted delay;

1        WHEREAS, the requested extension will not alter the dates set for the final  
2 pretrial conference or the beginning of trial;

3        NOW, THEREFORE, the Parties stipulate and request as follows:

4        That the case schedule set by the Court's June 16 minute order (Dkt. 49) shall be  
5 modified to extend the existing discovery deadlines by approximately 60 days as  
6 follows:

Event	Date
Completion of fact discovery	January 12, 2025
Initial expert disclosures and reports	February 16, 2026
Rebuttal expert disclosures and reports	March 13, 2026
Completion of expert discovery	April 13, 2026
Last day to file dispositive motions	June 8, 2026

15        Dated: September 16, 2025

16        By: /s/ Jacob R. Winningham

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19            Kevin S. Asfour (SBN 228993)

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26            Attorneys for Defendants  
27            EVENT TICKETS CENTER, INC.  
28            and TICKETNETWORK, INC.

25        Dated: September 15, 2025

26        By: /s/ Martin Brenner

27            (as authorized on September 15, 2025)

28            Simon Franzini (Cal. Bar No. 287631)

29            simon@dovel.com

30            Martin Brenner (Cal. Bar No. 333540)

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**STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY  
DEADLINES**

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**CIVIL LOCAL RULE 131(e) ATTESTATION**

Pursuant to Civil Local Rule 131(e), the undersigned filer attests that the other signatories hereto are registered CM/ECF filers and have concurred to the filing of this document.

Dated: September 16, 2025

/s/ Jacob R. Winningham  
Jacob R. Winningham

## **PROPOSED ORDER**

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED:

The Scheduling Order set forth in the Court's June 16, 2025 minute order shall be modified to extend the existing discovery deadlines by approximately 60 days as set forth below:

Event	Date
Completion of fact discovery	January 12, 2025
Initial expert disclosures and reports	February 16, 2026
Rebuttal expert disclosures and reports	March 13, 2026
Completion of expert discovery	April 13, 2026
Last day to file dispositive motions	June 8, 2026

Dated:

Hon. Dale A. Drozd

UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 **Case No. 2:24-CV-01983-DAD-AC**

3 I am employed in the county of Los Angeles, State of California. I am over the  
4 age of 18 and not a party to the within action; my business address is: K&L GATES  
5 LLP, 10100 Santa Monica Boulevard Eighth Floor, Los Angeles, CA 90067.

6 On September 16, 2025 I served the document(s) described as:

7 **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY  
8 DEADLINES**

9 Service of the above referenced document was provided to the parties as stated  
10 below:

12 Christin Cho (Cal. Bar No. 238173)  
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12 *Counsel for PLAINTIFFS*  
13 KRISTINA HERNANDEZ  
14 and JULIE VARON

15  **BY ECF:** The undersigned certifies that the document listed above was filed  
16 this September 16, 2025. Notice of this filing will be sent to all parties in this  
17 case listed below by operation of the Court's electronic filing system (ECF).  
18 Parties may access this filing via the Court's ECF system.

19 I declare under penalty of perjury under the laws of the United States of  
20 America that the foregoing is true and correct.

21 Executed on September 16, 2025 at Los Angeles, California.

22 Jacob Winningham

23   
24 Signature